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2 United States Attorney

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7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION

10 **CR 02 0383**

11 UNITED STATES OF AMERICA,

No.

12 Plaintiff,

13 v.

14 ESPIE CARGADO,
15 KENNETH DALE VERNON,
16 MARK EDWARD HILL,
CHRIS QUITORIANO, and
MOI KEOPASEUTH, aka Tom Moi,

MJ.
VIOLATIONS: Title 18, United
States Code, Section 371 - Conspiracy;
18 United States Code, Section 1708-
Possession of Stolen U.S. Mail; 18
United States Code, Section 1704-
Possession of Reproduced U.S. Postal
Keys

17 Defendants.

SAN FRANCISCO VENUE

18
19
20 I N D I C T M E N T

21 The Grand Jury charges:

22 COUNT ONE: 18 U.S.C. § 371

23 1. Between in or about 1999 and in or about September, 2002, in the Counties
24 of Alameda, Contra Costa, and San Francisco, within the State and Northern District of
25 California, and elsewhere, the defendants

26 ESPIE CARGADO,
27 KENNETH DALE VERNON,
MARK EDWARD HILL,
CHRIS QUITORIANO,
28 and
MOI KEOPASEUTH, aka Tom Moi,

1 did combine, conspire, and agree with each other and with unindicted co-conspirator
2 Generose Yambao, and with other conspirators known and unknown to the grand jury, to
3 steal United States mail, to use information from stolen United States mail to acquire and
4 use credit cards fraudulently, and to steal funds from the bank accounts of the victims
5 whose personal identity information had been stolen.

6 2. It was a part of the conspiracy that:

7 a. defendants Cargado and Vernon acquired U.S. mail locks
8 stolen from the United States Postal Service. These mail locks are used to secure U.S.
9 mail receptacles.

10 b. defendants Cargado, Vernon, Hill and Quitoriano and other
11 co-conspirators made keys which could be used to open United States Postal Service
12 receptacles. From time to time the defendants traded these counterfeit postal keys to
13 other members of the conspiracy in exchange for stolen United States mail, identity
14 profiles obtained from stolen mail, or merchandise fraudulently obtained by use of
15 information obtained from stolen mail.

16 c. defendants Cargado, Vernon, and Hill stole mail from letter
17 boxes, mail receptacles and other authorized depositories for mail matter.

18 d. the defendants and other co-conspirators used the information
19 obtained from the stolen mail to obtain credit cards fraudulently, to counterfeit checks,
20 and otherwise to acquire cash and purchase goods fraudulently.

21 Overt Acts

22 3. As a part of and in furtherance of the conspiracy the defendants committed
23 the following overt acts, among others:

24 a. On January 25, 2001, defendant Vernon possessed a counterfeit
25 mailbox key.

26 b. On January 25, 2001, Mark Edward Hill possessed mail addressed to
27 Catherine Hutton, 1805 Pine Street, No. 35, San Francisco, California.

28 c. On or September 5, 2001, Chris Quitoriano possessed stolen United

1 States mail addressed to 213 Edinburgh Street, San Francisco, California.

2 d. On September 7, 2001, Moi Keopaseuth possessed stolen mail which
3 was addressed to persons at 222 Leavenworth Street, 1090 Eddy and 10 Capra Way, San
4 Francisco, California.

5 e. On April 18, 2002, Kenneth Vernon possessed numerous pieces of
6 stolen first class United States mail addressed to, among other addresses, 5285 Diamond
7 Heights Blvd., 5235 Diamond Heights Blvd., 2363 Larkin Street, 737 Pine Street, 1775
8 Greenwich Street, and 2040 Franklin Street, all in San Francisco, California.

9 f. On May 16, 2002, Espie Cargado and Kenneth Vernon possessed
10 over 600 pieces of stolen United States mail, as well as numerous counterfeit United
11 States Postal Service mailbox keys, four United States Postal Service locks, as well as
12 United States Postal Service letter carrier shirts.

13 g. On or about May 28, 2002, Chris Quitoriano possessed stolen United
14 States mail addressed to 1850 Gough Street, 1801 California Street, and 2055 Sacramento
15 Street, San Francisco, California.

16 All in violation of 18 U.S.C. § 371.

17
18 COUNT TWO: (18 U.S.C. § 1708)

19 1. On or about May 16, 2002, in the City of San Francisco, within the State
20 and Northern District of California, the defendants

21 ESPIE CARGADO
22 and
KENNETH DALE VERNON

23 did unlawfully have in their possession letters and other mail, and articles and things
24 contained therein, to wit, approximately 700 pieces of mail matter addressed to:

25 a. 1215 Greenwich St., San Francisco, California 94109;

26 b. 10 Capra Way, San Francisco, California 94123;

27 c. 1925 Leavenworth St., San Francisco, California 94133;

28 d. 5235 Diamond Heights Blvd., San Francisco, California 94131;

1 e. 5285 Diamond Heights Blvd., San Francisco, California 94131;
2 f. 44 Macondray, San Francisco, California,
3 which had been stolen from authorized depositories for mail matter, knowing it to have
4 been stolen.

5 In violation of 18 U.S.C. § 1708.

6
7 COUNT THREE: (18 U.S.C. § 1704)

8 1. On or about May 16, 2002, in the City of San Francisco, within the State
9 and Northern District of California, the defendants

10 ESPIE CARGADO
11 and
12 KENNETH DALE VERNON

13 did knowingly and unlawfully possess keys suited to, and in use on, locks to authorized
14 depositories for mail matter, with the intent unlawfully or improperly to use said keys.
15 In violation of 18 U.S.C. § 1704.

16
17 COUNT FOUR: (18 U.S.C. § 1704)

18 1. On or about May 16, 2002, in the City of San Francisco, within the State,
19 and Northern District of California, the defendants

20 ESPIE CARGADO
21 and
22 KENNETH DALE VERNON

23 did knowingly and unlawfully possess mail locks in use on authorized depositories for
24 mail matter, with the intent unlawfully or improperly to use said mail locks.
25 In violation of 18 U.S.C. § 1704.

26 COUNT FIVE (18 U.S.C. § 1708)

27 1. On or about April 18, 2002, the City of San Francisco, within the State
28 and Northern District of California, the defendant

1 KENNETH DALE VERNON

2 did unlawfully have in his possession letters and other mail, and articles and things
3 contained therein, to wit, numerous pieces of first class United States mail addressed to
4 addressees at

- 5 a. 2363 Larkin St., San Francisco, California 94109;
6 b. 1275 Greenwich St., San Francisco, California 94109;
7 c. 1275 Greenwich St., San Francisco, California 94109;
8 d. 5235 Diamond Heights Blvd., San Francisco, California 94131;
9 e. 5285 Diamond Heights Blvd., San Francisco, California 94131;
10 f. 44 Macondray, San Francisco, California, 94133,

11 which had been stolen from authorized depositories for mail matter, knowing them to
12 have been stolen.

13 In violation of 18 U.S.C. § 1708.

14
15 COUNT SIX: (18 U.S.C. § 1704)

16 1. On or about April 18, 2002, in the City of San Rafael, within the State
17 and Northern District of California, the defendant

18 KENNETH DALE VERNON

19
20 did knowingly and unlawfully possess keys suited to, and in use on, locks to authorized
21 depositories for mail matter, with the intent unlawfully or improperly to use said keys.

22 In violation of 18 U.S.C. § 1704.

23
24 COUNT SEVEN: (18 U.S.C. § 1708)

25 1. On or about January 25, 2001, in the City of San Francisco, within the State
26 and Northern District of California, the defendant

27 MARK HILL

1 did unlawfully have in his possession mail, to wit, first class United States mail
2 addressed to 1805 Pine Street, No 35, San Francisco, California, knowing it to have been
3 stolen.

4 In violation of 18 U.S.C. § 1708.

5
6 COUNT EIGHT: (18 U.S.C. § 1704)

7 1. On or about September 18, 2001, in the City of San Francisco, within the
8 State and Northern District of California, the defendant

9 MARK HILL

10
11 did knowingly and unlawfully possess keys suited to, and in use on, locks to authorized
12 depositories for mail matter, with the intent unlawfully or improperly to use said keys.
13 In violation of 18 U.S.C. § 1704.

14
15 COUNT NINE: (18 U.S.C. § 1704)

16 1. On or about May 28, 2002, in the City of San Francisco, within the State
17 and Northern District of California, the defendant

18 CHRIS QUITORIANO

19 did knowingly and unlawfully possess a key suited to, and in use on, locks to authorized
20 depositories for mail matter, with the intent unlawfully or improperly to use said key.
21 In violation of 18 U.S.C. § 1704.

22
23 COUNT TEN: (18 U.S.C. § 1708)

24 1. On or about May 28, 2002, in the City of San Francisco, within the
25 State and Northern District of California, the defendant

26 CHRIS QUITORIANO

27 did unlawfully have in his possession mail, to wit, letters addressed to 1850 Gough
28 Street, 1801 California Street, and 2055 Sacramento Street, San Francisco, California,

1 which had been stolen from authorized depositories for mail matter, knowing them to
2 have been stolen.

3 In violation of 18 U.S.C. § 1708.

4
5 DATED:

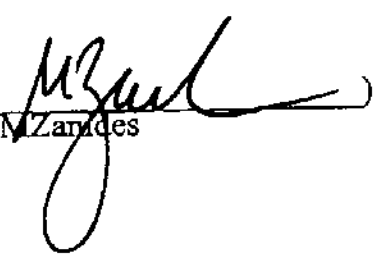
6 12/03/2002

A TRUE BILL.

7 
FOREPERSON

8 KEVIN V. RYAN
9 United States Attorney

10 
11 JOHN T. LAETTNER
12 Chief, Oakland Branch

13 (Approved as to form: 
14 M. Zandies